

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)

v.)

CRIMINAL NO. 09-10243-MLW)

RYAN HARRIS)

SUMMARY OF DEFENDANT'S OBJECTIONS
TO GOVERNMENT EXHIBITS

In accordance with the Court's order of February 9, 2012, Ryan Harris respectfully submits a chart summarizing his current objections to the government's proposed exhibits, following the sequence of exhibits discussed in the Government's Witness and Exhibit Order. Harris intends this summary chart as an aid for the Court, and reserves his right to make any and all objections at trial, including those not listed below.

Exhibits:

WITNESS	GOV. EX. #	SUMMARY OF CURRENT OBJECTIONS
Craig Phillips	1	None at this time.
Craig Phillips	2	None at this time.
Craig Phillips	3	Pages 3-6 Only: Relevance (Rule 403); Other Bad Acts (Rule 404(b)); Hearsay (Rule 802).
Craig Phillips	5	Relevance (Rule 403); Other Bad Acts (Rule 404(b)); Hearsay (Rule 802); Authentication (Rule 901).
Craig Phillips	6	Relevance (Rule 403); Other Bad Acts (Rule 404(b)); Hearsay (Rule 802); Authentication (Rule 901).
Craig Phillips	10	None at this time.
Craig Phillips	17	Relevance (Rule 403); Other Bad Acts (Rule 404(b)); Hearsay (Rule 802); Authentication (Rule 901).

Craig Phillips	18	Relevance (Rule 403); Other Bad Acts (Rule 404(b)); Hearsay (Rule 802); Authentication (Rule 901).
Craig Phillips	19	Relevance (Rule 403); Other Bad Acts (Rule 404(b)); Hearsay (Rule 802); Authentication (Rule 901).
Craig Phillips	20	Relevance (Rule 403); Other Bad Acts (Rule 404(b)); Hearsay (Rule 802); Authentication (Rule 901).
Craig Phillips	21	Relevance (Rule 403); Other Bad Acts (Rule 404(b)); Hearsay (Rule 802); Authentication (Rule 901).
Craig Phillips	26	None at this time.
Craig Phillips	29	None at this time.
Christopher Kohler	N/A	N/A.
Isabella Lindquist	6	Relevance (Rule 403); Other Bad Acts (Rule 404(b)); Hearsay (Rule 802); Authentication (Rule 901).
Benjamin Brodfuehrer	8	Relevance (Rule 403).
Benjamin Brodfuehrer	9	Relevance (Rule 403).
Jose LaRosa	15	None at this time.
William Madeira	N/A	N/A
Nathan Hanshaw	10	None at this time.
Nathan Hanshaw	11	Relevance (Rule 403); Other Bad Acts (Rule 404(b)); Hearsay (Rule 802).
Nathan Hanshaw	12	Relevance (Rule 403); Other Bad Acts (Rule 404(b)); Hearsay (Rule 802).
Nathan Hanshaw	27	None at this time.
GoDaddy Record Keeper	4	Hearsay (Rule 802).
GoDaddy Record Keeper	31	None at this time.
Timothy Russell	2	None at this time.
Timothy Russell	3	Hearsay (Rule 802) (Pages 3-6 only).
Timothy Russell	4	Hearsay (Rule 802).

Timothy Russell	7	None at this time (with the understanding that the entire book will be admitted as evidence).
Timothy Russell	13	None at this time.
Timothy Russell	14	Authentication (Rule 901).
Timothy Russell	16	None at this time.
Timothy Russell	17	Relevance (Rule 403); Other Bad Acts (Rule 404(b)); Hearsay (Rule 802); Authentication (Rule 901).
Timothy Russell	18	Relevance (Rule 403); Other Bad Acts (Rule 404(b)); Hearsay (Rule 802); Authentication (Rule 901).
Timothy Russell	19	Relevance (Rule 403); Other Bad Acts (Rule 404(b)); Hearsay (Rule 802); Authentication (Rule 901).
Timothy Russell	20	Relevance (Rule 403); Other Bad Acts (Rule 404(b)); Hearsay (Rule 802); Authentication (Rule 901).
Timothy Russell	21	Relevance (Rule 403); Other Bad Acts (Rule 404(b)); Hearsay (Rule 802); Authentication (Rule 901).
Timothy Russell	22	Relevance (Rule 403); Other Bad Acts (Rule 404(b)); Hearsay (Rule 802).
Timothy Russell	23	Relevance (Rule 403); Other Bad Acts (Rule 404(b)); Hearsay (Rule 802).
Timothy Russell	24	Relevance (Rule 403); Other Bad Acts (Rule 404(b)); Hearsay (Rule 802).
Timothy Russell	28	Relevance (Rule 403); Other Bad Acts (Rule 404(b)); Hearsay (Rule 802).
Jason Ryan	4	Hearsay (Rule 802).
Jason Ryan	25	Relevance (Rule 403).
Jason Ryan	30	None at this time.
Jason Ryan	31	None at this time.

RYAN HARRIS

By his attorney,

/s/ Charles P. McGinty

Charles P. McGinty

B.B.O. #333480

Federal Defender Office

51 Sleeper Street

Boston, MA 02210

Tel: 617-223-8061

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on February 16, 2012.

/s/ Charles P. McGinty

Charles P. McGinty